

# Exhibit 36

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July 19, 2021

**VIA EMAIL**[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)

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**RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,***  
**No. 1:19-md-02875**

Dear Counsel:

We are writing to follow up on Plaintiffs' July 13, 2021 letter requesting confirmation that ZHP produced Baohua Chen's complete custodial file on July 12, 2021, and requesting the immediate production of Xiaofang (Maggie) Kong's custodial file. To date you have not responded and have not produced Maggie Kong's custodial file.

Baohua Chen's custodial file appears to be demonstrably incomplete. Plaintiffs note that the file contains only 326 documents. Only 15 of those documents predate ZHP's recall of its contaminated valsartan. Despite signing the 2010 contract on behalf of Shanghai Syncores to develop the ZnCl<sub>2</sub> process, and having extensive input into numerous issues including for example pricing, market share, and other issues, **the earliest document in his custodial file is a January 24, 2018 email.**

Seth A. Goldberg, Esq.  
Duane Morris LLP  
July 19, 2021  
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ZHP has previously produced approximately 32 emails involving Mr. Chen from 2010, 12 from 2011, 4 from 2012, 3 from 2013, 14 from 2014, 4 from 2015, 7 from 2016, and 55 from 2017. Yet, none of these emails are in the custodial file that you produced on July 12, 2021, nor is he listed as a duplicative custodian on any of them. In fact, the July 12, 2021 production has a mere 161 documents containing Mr. Chen's email address.

Plaintiffs intend to raise these issues with the Court at the next case management conference if they cannot be resolved.

Very truly yours,



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ADAM M. SLATER